

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

FILED

OCT 20 2010

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY _____ DEPUTY CLERK

UNITED STATES OF AMERICA)
)
V.) CR. NO. MO-09-CR-323
)
ARIEL BRUNSON)

FACTUAL BASIS

If this case had gone to trial, the Government would have proven the following beyond a reasonable doubt:

On or about September 3, 2009 in the Western District of Texas, the Defendant, **ARIEL BRUNSON**, having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, her husband, John Christopher Brunson's, production of child pornography by a parent, contrary to Title 18, United States Code, Section 2251(b), did conceal the same and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, in violation of Title 18, United States Code, Section 4.

Specifically, prior to September 3, 2009, Defendant Ariel Brunson's husband, John Christopher Brunson, took lascivious photographs of his three year old daughter. Some of these photographs depicted a lascivious display of the child's genitalia, while others included photos of the child performing oral sex on John Christopher Brunson. These photographs were taken using a digital camera that was manufactured outside the state of Texas. After the photographs were taken, they were uploaded onto John Christopher

Brunson and Defendant Ariel Brunson's computer and saved there. Defendant Ariel Brunson was aware her husband, John Christopher Brunson, was taking photographs depicted a lascivious display of the her child's genitalia and failed to notify an authority as soon as possible. Additionally, when questioned by law enforcement Defendant Ariel Brunson said she had no knowledge of the photographs or the actions of her husband, thus concealing the crime.

Ariel Brunson

ARIEL BRUNSON

Defendant

Tracey Scown

Ms. TRACEY SCOWN

Attorney for Defendant

JOHN E. MURPHY

UNITED STATES ATTORNEY

Date: 10/20/10

By: Brandi Young

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